

December 12, 2001

Mr. Mark Stone
FCC Common Carrier Bureau
Accounting Safeguards Division
445 Twelfth Street S.W.: Room 6-C365
Washington, D.C. 20554

Re: Performance Measurements – Version 2.0 Business Rules for Ameritech and SNET

Mark,

In order to assist the CCB in deciding how to update the Plan for the Ameritech States and Connecticut, SBC is providing updated and detailed versions of the Ameritech and SNET business rules, reflecting the business conditions in those states. SBC proposes to implement the version 2.0 changes to the business rules in the Ameritech States and Connecticut, effective with January 2002 business.

On November 16, 2001, representatives of SBC reviewed in detail with you and Whitey Thayer the draft versions of the new business rules for both Ameritech and SNET, including the version 2.0 updates. SBC provided both redlined and “accepted” versions of the edited documents on November 27, 2001.

On December 6, 2001, during the SBC / FCC Performance Measurement “Six Month Review,” Ameritech presented additional edits and clarifications. These changes have been incorporated into the redlined and “accepted” versions of the attached documents. These documents reflect the updates and adaptations engendered by the recent Texas update as well as other adaptations which Ameritech and SNET have implemented in prior updates. The following is a summary of Ameritech changes and adaptations presented at the meeting on December 6, 2001.

AIT Version 2.0 Additional Clean-up Items presented at the Six Month Review:
The proposed implementation of the Texas 2.0 business rules required additional clarification for the following performance measures (PM):

PM 1 – Mechanized xDSL capable loops - align FCC intervals with state intervals.

PM 4c – As with the other business rules regarding UNEs, make explicit that cancels are counted at the item level.

PM 5c – Define PTRs in the Exclusion section of the measure.

PM 6c.1 – Add an exclusion for weekends and holidays to the Exclusion section of the measure to be consistent with PM 6c.

PM 7a and PM 7b – Add the exclusion for “incremental delay days” that is stated in PM 7c to PM 7a and PM 7b for consistency.

PM 8 – Add back wording on the two-step process in Business Rules section of measure which was mistakenly deleted in the previous submission.

PM 5a, 10a, 11a, 12a and 13a – Delete references to disposition code “1316” from the Exclusion section of these measures since AIT does not take these types of reports.

AIT Version 2.0 Additional Changes Proposed at the Six Month Review

PM 4c, 5c, 7c, 10b, 11c, 12c and 13c – Avoid double counting by removing non-designed ISDN retail services from the retail comparison (POTS Res/Bus) for all 8dB loop disaggregations. Non-designed ISDN retail services are already included in the retail comparison for UNE BRI loops.

PM 5c, 10b, 11c, 12c, and 13c – Add an additional exclusion to measures listed for situations when a CLEC accepts a loop “As Is.”

PM 4d – Add an exclusion for CLEC caused delays and misses.

SNET Version 2.0 Additional Clean-up Items:

While additional SNET changes and adaptations were not presented at the meeting, the following is a summary of four additional SNET edits and clarifications. Attached are both redlined and “accepted” versions of the edited documents.

PM 6c.1 – Add an exclusion for weekends and holidays to the Exclusion section of the measure to be consistent with PM 6c.

PM 7a and PM 7b – Add the exclusion for “incremental delay days” from PM 7c to PM 7a and PM 7b for consistency.

PM 5c, 10b, 11c, 12c, and 13c – Clarify existing exclusion in the business rule for situations when a CLEC accepts a loop “As Is.”

SBC proposes to implement all of these Version 2.0 changes for January 2002's data reported in February 2002. In order to meet this ambitious target, SBC is already proceeding with its programming for the 2.0 changes listed above and the changes reported in the letter dated November 27, 2001; therefore, we would like the CCB's approval of a final version by December 21, 2001. Assuming approval is granted by December 21, 2001, SBC intends to implement all approved changes for January 2002 business. As with implementation of earlier changes to the business rules, if any unforeseen circumstances arise, SBC will notify the CCB. Please let me know if there is any other information you need to aid in your review. Thank you for your consideration.

Sincerely,

Signed By David G. Cartwright

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